

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
JUNE LAURIE REICH : CASE NO. 5-20-02542

Debtor : CHAPTER 13

TOYOTA MOTOR CREDIT CORP. :

Movant, :

vs. :

JUNE LAURIE REICH :

Respondents. :

DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362

AND NOW COMES, June Laurie Reich, and files an Answer Toyota Motor Credit Corporation's Motion for Relief From the Automatic Stay:

1. June Laurie Reich, (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.

2. Charles J. DeHart, III, Esq. was appointed the Chapter 13 Trustee.

3. Under the Chapter 13 Plan, Debtor was to make regular monthly payments to the Movant outside of the Plan.

4. Movant alleges that Debtor has failed to make monthly car loan payments.

5. Debtor has been making payments of \$250.00 to Movant pursuant to an agreement made with Movant over the phone. Debtor spoke with Movant and made agreements to continue to make monthly payments of \$250.00 on the car loan.

6. The Debtor wishes to enter into a Stipulation to cure the arrears by including them in an amended Plan. Further, the Debtor wishes that Movant modify the terms of the contract and reduce the monthly payments to \$250.00.

7. Movant is not entitled to relief from the automatic stay as there is equity in the property encumbered by Movant's security interest, arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: June 16, 2021

/s/Tullio DeLuca
Tullio DeLuca, Esquire
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 16, 2021, he caused a true and correct copy of Debtor's Answer to Toyota Motor Credit Corp's Motion for Relief from the Automatic Stay to be served via electronic filing to the CM/ECF participant at the following:

Jack N. Zaharopoulos, Esq. at info@pamd13trustee.com

Keri P. Ebeck, Esq. at kebeck@bernsteinlaw.com

Date: June 16, 2021

/s/Tullio DeLuca
Tullio DeLuca, Esq.